

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TWC LIQUIDATION TRUST, LLC,

Debtor.

Dean A. Ziehl, in his capacity as trustee of the
TWC LIQUIDATION TRUST, LLC,

Plaintiff,

v.

ANDREW R. VARA, in his capacity as the
United States Trustee for Region 3; RAMONA
D. ELLIOTT, in her capacity as Acting Director
of the United States Trustee Program; and the
UNITED STATES TRUSTEE PROGRAM,

Defendants.

) Chapter 11

) Case No. 18-10601 (MFW)

) Adv. Proc. No. 22-50476

NOTICE OF AGENDA OF MATTERS

**SCHEDULED FOR HEARING ON FEBRUARY 7, 2023 AT 11:30 A.M.
(PREVAILING EASTERN TIME) BEFORE THE HONORABLE MARY F. WALRATH**

**THIS HEARING HAS BEEN CANCELLED BY THE COURT
AS NO MATTERS ARE SCHEDULED TO GO FORWARD.**

CONTINUED MATTERS:

1. Liquidation Trustee's First Omnibus Objection (Non-Substantive) to Certain: (A) Amended and Superseded Claims; (B) Duplicate Claims; (C) No Liability Claims; and (D) Misclassified Claims [Filed: 4/22/22] ([Docket No. 3470](#))

Response Deadline: May 17, 2022 at 4:00 p.m. (ET). Further extended for Showtime to a date to be determined.

Responses Received:

- A. Response to Omnibus Objection to Claims Liquidation Trustee's First Omnibus Objection (Non-Substantive) Filed by Department of Taxation State of Hawaii [Filed: 5/9/22] ([Docket No. 3476](#))

Status: The Liquidating Trustee and the State of Hawaii have engaged in discussions to resolve the objection. This matter is adjourned to the next omnibus hearing date.

- B. Response to Omnibus Objections Filed by Heidi Coyne DBA LA Styles [Filed: 5/16/22] ([Docket No. 3483](#))

Status: This matter has been resolved and will not go forward. The Liquidating Trustee has reached an agreement with claimant and will submit a stipulation resolving claimant's response.

- C. Illinois Department of Revenue's Response to Liquidation Trustee's First Omnibus Objection [Filed: 5/17/22] ([Docket No. 3485](#))

Status: This matter is adjourned to the next omnibus hearing date.

- D. Informal response of Arkansas Department of Finance and Administration

Status: The Liquidating Trustee and State of Arkansas have resolved this objection subject to the filing of an amended return.

- E. Informal response of Showtime Networks Inc.

Status: The Liquidating Trustee and Showtime have engaged in discussions to resolve the objection. This matter is adjourned to the next omnibus hearing date.

- F. Ohio Department of Taxation's Response and Opposition to Liquidation Trustee's Notice of Supplemental Declaration [Filed: 1/3/23] (Docket No. 3567)

Status: The Liquidating Trustee and the Ohio Department of Taxation are engaged in discussions to resolve the objection. This matter is adjourned to the next omnibus hearing date.

Related Documents:

- A. Notice of Submission of Proofs of Claim in Connection with Liquidation Trustee's First Omnibus Objection (Non-Substantive) to Certain: (A) Amended and Superseded Claims; (B) Duplicate Claims; (C) No Liability Claims; and (D) Misclassified Claims [Filed: 5/10/22] ([Docket No. 3479](#))
- B. Certification of Counsel Regarding Liquidation Trustee's First Omnibus

Objection (Non-Substantive) to Certain: (A) Amended and Superseded Claims; (B) Duplicate Claims; (C) No Liability Claims; and (D) Misclassified Claims [Filed: 5/23/22] ([Docket No. 3491](#))

- C. Certification of Counsel Regarding Liquidation Trustee's First Omnibus Objection (Non-Substantive) to Certain: (A) Amended and Superseded Claims; (B) Duplicate Claims; (C) No Liability Claims; and (D) Misclassified Claims [Filed: 6/15/22] ([Docket No. 3499](#))
- D. [Signed] Order Sustaining Liquidation Trustee's First Omnibus Objection (Non-Substantive) to Certain: (A) Amended and Superseded Claims; (B) Duplicate Claims; (C) No Liability Claims; and (D) Misclassified Claims [Filed: 6/16/22] ([Docket No. 3500](#))
- E. Notice of Filing of Liquidation Trustee's Supplemental Declaration in Support of First Omnibus Objection (Non-Substantive) to Certain: (A) Amended and Superseded Claims; (B) Duplicate Claims; (C) No Liability Claims; and (D) Misclassified Claims [Filed: 12/9/22] ([Docket No. 3564](#))
 - i. Notice of Filing of Exhibit "A" to Supplemental Declaration of Kyle Herman in Support of Liquidation Trustee's First Omnibus Objection (Non-Substantive) to Certain: (A) Amended and Superseded Claims; (B) Duplicate Claims; (C) No Liability Claims; and (D) Misclassified Claims [Filed: 12/14/22] ([Docket No. 3566](#))
- F. Certification of Counsel Regarding Liquidation Trustee's First Omnibus Objection (Non-Substantive) to Certain: (A) Amended and Superseded Claims; (B) Duplicate Claims; (C) No Liability Claims; and (D) Misclassified Claims [Filed: 1/9/23] ([Docket No. 3571](#))
- G. [Signed] Supplemental Order Sustaining Liquidation Trustee's First Omnibus Objection (Non-Substantive) to Certain: (A) Amended and Superseded Claims; (B) Duplicate Claims; (C) No Liability Claims; and (D) Misclassified Claims [Filed: 1/9/23] ([Docket No. 3573](#))

Status: This matter is adjourned to the next omnibus hearing date with respect to the response of the Ohio Department of Taxation.

- 2. Amended Complaint for Declaratory Judgment and Recovery of Fees pursuant to 11 U.S.C. §§ 549 and 550 [Filed: 12/30/22] (Docket No. 4)

Responses Received: None.

Related Documents:

- A. Complaint for Declaratory Judgment and Recovery of Fees pursuant to 11 U.S.C. §§ 549 and 550 [Filed: 12/12/22] (Adv. Pro. No. 22-50476, [Docket No. 1](#))

- B. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Filed: 12/12/22] (Adv. Pro. No. 22-50476, [Docket No. 2](#))
- C. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Filed: 12/30/22] (Adv. Pro. No. 22-50476, [Docket No. 5](#))
- D. [Signed] Order Approving Stipulation for Extension of Time [Filed: 1/11/23] (Adv. Pro. No. 22-50476, [Docket No. 7](#))
- E. Liquidation Trustee's Motion for Summary Judgment for a Refund of Overpaid United States Trustee Program Fees Time [Filed: 1/30/23] (Adv. Pro. No. 22-50476, [Docket No. 8](#))
- F. Memorandum of Law in Support of Liquidation Trustee's Motion for Summary Judgment for a Refund of Overpaid United States Trustee Program Fees Time [Filed: 1/30/23] (Adv. Pro. No. 22-50476, [Docket No. 9](#))
- G. Declaration of Kyle Herman in Support of Liquidation Trustee's Motion for Summary Judgment for a Refund of Overpaid United States Trustee Program Fees Time [Filed: 1/30/23] (Adv. Pro. No. 22-50476, [Docket No. 10](#))

Status: The pre-trial conference is adjourned to a date to be determined.

- 3. Motion to Enforce Provisions of the Order (I) Authorizing the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, Encumbrances and Other Interests, (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith, and (III) Granting Related Relief [Filed: 6/15/22] ([Docket No. 3498](#)).

Response Deadline: June 22, 2022 at 4:00 p.m. (*extended until November 2, 2022 at 9:00 p.m. for Spyglass*)

Responses Received:

- A. Response to the Guilds' Motion to Enforce Provisions of the Order (I) Authorizing the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, Encumbrances and Other Interests, (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith, and (III) Granting Related Relief [Filed: 11/9/22] ([Docket No. 3556](#)).

Reply Deadline: November 22, 2022, at 9:00 p.m.

Related Documents:

- A. [Signed] Order (I) Authorizing the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, Encumbrances and Other Interests, (II) Authorizing the Assumption and Assignment of Certain Executory

Contracts and Unexpired Leases in Connection Therewith, and (III) Granting Related Relief [Filed: 5/9/18] ([Docket No. 846](#)).

- B. Notice of Closing of Sale to Lantern Entertainment LLC [Filed: 7/17/18] ([Docket No. 1247](#)).
- C. [Proposed] Order Granting Motion to Enforce Provisions of the Order (I) Authorizing the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, Encumbrances and Other Interests, (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith, and (III) Granting Related Relief [Filed: 6/15/22] ([Docket No. 3498](#)).
- D. [Signed] Order Approving Stipulation By and Between the Directors Guild of America, Inc., the writers Guild of America, West, Inc., The Screen Actors Guild-American Federation of Television and Radio Arts and the Motion Picture Industry Pension and Health Plans and Spyglass Media Group, LLC Regarding Briefing Schedule for Hearing on Motion to Enforce Provisions of the Sale Order [Filed: 8/17/22] ([Docket No. 3526](#)).
- E. [Signed] Order Approving Second Stipulation By and Between the Directors Guild of America, Inc., the writers Guild of America, West, Inc., The Screen Actors Guild-American Federation of Television and Radio Arts and the Motion Picture Industry Pension and Health Plans and Spyglass Media Group, LLC Regarding Briefing Schedule for Hearing on Motion to Enforce Provisions of the Sale Order [Filed: 9/19/22] ([Docket No. 3537](#)).
- F. Certification of Counsel Submitting Order Approving Third Stipulation By and Between the Directors Guild of America, Inc., the writers Guild of America, West, Inc., The Screen Actors Guild-American Federation of Television and Radio Arts and the Motion Picture Industry Pension and Health Plans and Spyglass Media Group, LLC Regarding Briefing Schedule for Hearing on Motion to Enforce Provisions of the Sale Order [Filed: 10/19/22] ([Docket No. 3551](#)).
- G. [Signed] Order Approving Third Stipulation By and Between the Directors Guild of America, Inc., the writers Guild of America, West, Inc., The Screen Actors Guild-American Federation of Television and Radio Arts and the Motion Picture Industry Pension and Health Plans and Spyglass Media Group, LLC Regarding Briefing Schedule for Hearing on Motion to Enforce Provisions of the Sale Order [Filed: 10/24/22] ([Docket No. 3553](#)).

Status: This matter is continued to the next omnibus hearing date.

4. Motion and Memorandum of Law to Enforce Provisions of the Order (I) Authorizing the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, Encumbrances and Other Interests, (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases In Connection Therewith, and (III) Granting Related Relief [Filed by the Guilds] [Filed: 10/6/22] ([Docket No. 3544](#)).

Response Deadline: October 13, 2022, at 4:00 p.m.

Responses Received: None.

Related Documents:

- A. [Proposed] Order Granting Motion and Memorandum of Law to Enforce Provisions of the Order (I) Authorizing the Sale of All or Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, Encumbrances and Other Interests, (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases In Connection Therewith, and (III) Granting Related Relief [Filed by the Guilds] [Filed: 10/6/22] ([Docket No. 3544](#)).
- B. Certification of Counsel Submitting Order Approving Third Stipulation By and Between the Directors Guild of America, Inc., the writers Guild of America, West, Inc., The Screen Actors Guild-American Federation of Television and Radio Arts and the Motion Picture Industry Pension and Health Plans and Spyglass Media Group, LLC Regarding Briefing Schedule for Hearing on Motion to Enforce Provisions of the Sale Order [Filed: 10/19/22] ([Docket No. 3551](#)).
- C. [Signed] Order Approving Third Stipulation By and Between the Directors Guild of America, Inc., the writers Guild of America, West, Inc., The Screen Actors Guild-American Federation of Television and Radio Arts and the Motion Picture Industry Pension and Health Plans and Spyglass Media Group, LLC Regarding Briefing Schedule for Hearing on Motion to Enforce Provisions of the Sale Order [Filed: 10/24/22] ([Docket No. 3553](#)).

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Status: This matter is continued to the next omnibus hearing date.

Dated: February 3, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

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